

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT - WI
FILED

Bobbie Bowen SR

2016 DEC 19 P 3:09

(Full Name of each Plaintiff)

Plaintiff(s).

JON W. SANFILIPPO
CLERK

Case No. 16-C-1677

(Supplied by Clerk)

v.

Judge Rebecca Dallet, Scott Walker

Wisconsin Department of Corrections / See attached list of names

(Full Name of each Defendant)

Defendant(s).

COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

I. PLACE OF PRESENT CONFINEMENT (Provide full address)

DODGE CORRECTIONAL INSTITUTION 7^W Lincoln St
PO BOX 700 Waupun, WI 53963-0700

A. Is there a grievance procedure in your prison/jail? YES ☒ NO ☐

B. Have you filed a grievance concerning the facts relating to this complaint?

YES ☒ NO ☐

II. PARTIES

A. Your name (Plaintiff) Bobbie Bowen SR

B. Institutional Identification Number #354316

C. Social Security Number (Last Four Digits Only) 5834

(For additional plaintiffs provide the information in Sections I and II, in the same format, on a separate page.)

PARTIES - continued

NLCI

E. DEFENDANT (name) Deputy Warden Thomas, Security Director L. Fuchs,
is employed as Security PA, Schellinger, Captain Achterberg of Seg, Sgt. Moran
at Sgt. Bender of seg Property, Segregation Sgt. Parise, Co. Kuchl ^{CR# 2263322}

F. Additional DEFENDANTS (name, position, and place of employment):

Sgt. Armstrong mail room, Co. Dressal ^{CR# 2263322}, L.T. Rahlf, Lt. Martinson
Co. Benson mailroom, Mr. Thyne, Capt. Kanneberg, Social worker's Ms. Navis
and Ms. Jensen, Inmate Accounts Ms. Trepez ^{Records} Ms. Wess... ^{Records} Records:
Ms. Selje, CR# 1704343, CR# 1704347... ^{Records} Ms. Schuman, Ms. Kibben or
^{Records} JM. Kibber ICE complaint examiners Brendon Ingenthron,
Charles Facktor, Cindy O'Donnell, Karen Gourlie, Timothy Thomas
^(CCI) Mary Leiser, Lucas Wogernese,

III. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court relating to the same facts involved in this action? ☒ YES ☐ NO
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? ☒ YES ☐ NO
- C. If your answer is YES to either of the above questions, provide the following requested information.

1. Parties to the previous lawsuit

Plaintiff(s): Bobbie Bowen SR

Defendant(s): Warden Dauma, Lt. Rahlf, Lt. Martinson, Co. Benson
Mr. Thyne, Capt. Kanneberg Related to this Claim !!!

2. Date filed March 6, 2015

3. Court where case filed (if federal court, name district: if state court, name the county) Eastern District of Wisconsin (Milwaukee)

• Parties Name(s) Continued : Defendant(s) . . .

• New Lisbon Correctional Institution :

Mr. Pleuss committee of Conduct Reports #1649756 and #2263322

PRC coordinator Ms. Baldwin

Classification Specialist K. Marmitz and J. Fowler

Bureau of Classification and Movement Mr. Heise Director

NLCI : Classification Lorie Esser

Education Director : Ms. Kennedy - ICE complaint NLCI-2013-17204

Guidance Counselor : Ms. Schallach / Horticulture

(Jhon Doe) (Jhon Doe) (Jhon Doe) (Jhon Doe)

Capt Baker : who did the Appeal Process for CR #2369832 at (NLCI)

• Correctional Officers NLCI :

Co. Hardy

Co. King Conduct Reports #2267731

Co. Olson seg, Co. Hinchley seg, LT. Henrichsen seg CR #1649756

Co. Plucinski JR CR #2267665

• HEALTH SERVICES :

Dr. Jhon Doe, HSU Unit Manager Warner, Unit C2 Psychologist Dr. Dennison

PSU Supervisor MR. Huneke, PSU Director Dr. Frodin Physician

Psychiatrist Dr. Reynolds, Warden Secretary J. Lange, Warden Dauma,"

• Columbia Correctional Institution :

PRC : L. Fait-PRC, Randy Scott PRC, LT. D. Morgan PRC

Social Workers : K. Scanlon, Ms. Champion, Ms. Procknow

Records : Ms. Dutton, Ms. Julie Surprise, J. Sommer

Unit Manager(s) : Mr. Ziegler, Ms. Schultz

Doctor(s) Dr. Vickery, Dr. Johnson / Dr. Stang, HSU-M. Mashakn

Warden Michael Dittman, Deputy Warden Sandra Hautamaki #5737

Jhon Doe, Jhon Doe, Jhon Doe, Jhon Doe

Melissa M Schueler #6719 Corrections Program Specialist

PREVIOUS LAWSUITS - continued

4. Case number 15-C-0255 is Related to this Claim of Due Process &
5. Nature of claim Retaliation/Mental Anguish that above Stated Case and this Claim has Significantly affected my daily life Activities
6. Current status (for example: open, closed, on appeal) Open
7. If resolved, date of resolution _____
8. If resolved, state whether for the plaintiff or the defendant: _____

(For additional cases, provide the above information in the same format on a separate page.)

IV. STATEMENT OF CLAIM

- A. State as briefly as possible the facts of your case. Describe how each named defendant is involved. Include the names of other persons involved, dates, and places. Describe specifically the injuries sustained. Do not give legal arguments or cite cases or statutes. You may do that in Section "B" below. If you allege related claims, number and set forth each claim in a separate paragraph. Unrelated claims must be raised in a separate civil action.

Warden Douma, Security Director L. Fuchs, allowed his Staff to Violate my 1st 4th 5th 8th and 14th Amendment Rights knowingly. Co. Benson who started this whole manner open my Personal mail incoming and outgoing Mail and stole items out of my AODA/Anger-Management Portfolio, and alleged I was writing the NO-Contact Victim in question, and issued multiple Conduct Report(s) that was lies). To circumvent what was going on up Lt. Rahlf would hear all seven Conduct Reports #1704337, #1704343, #1704345, #1704347, #2267731, #2263322, #1649756, #2267665 and find me Guilty. To make sure that Lt. Rahlf covered up the Retaliatory Behavior of Staff at (N-L-C-T). Lt. Rahlf issued the last #final Conduct Report #2369832 with no dates or time on Conduct Report #2369832 and Security Director L. Fuchs helped cover up the Retaliation by mailing the mail to the NO-Contact Victim in question during an alleged investigation of Lt. Rahlf and Violated my Due Process Rights by not keeping the Evidence for 30-90 days Pending If I wanted to appeal CR#2369832 50/Fuchs mailed the Mail to the NO-Contact Victim in question...

STATEMENT OF CLAIM - continued

I latter found out that "Security Director L. Fuchs" is behind this whole issue's of Retaliation and Denied Due Process. Also, Warden Daura knew about the aforesaid issue's and knowingly turn a blind eye to his staff wanton Conduct. The end result resulted in me being transferred illegally by Mr. Thyne, Lt. Martinson, and Ms. Baldwin illegally Violating my 1st 4th 5th 8th 14th Amendment Rights (See attached Statement(s) of Claims For details)... Related to Civil case no. 15-C-0255.

B. State briefly your legal theory. You may cite appropriate authority.

Due Process: Issuing false and unjustified disciplinary Charges can amount to a Violation of substantive due Process if the Charges were issued in Retaliation for the exercise of a Constitutional right Black v Lane 22 F.3d 1395, 1402-03 (7th Cir 1994) Lagerstrom V. Kingston, 463 F.3d 621, 623 (7th Cir 2006).

Due Process: A procedural due process violation occurs when (#1) Conduct by Someone acting under the Color of State law (#2) deprives the Plaintiff of a Protected interest (#3) without due Process of law. Germano V. Winnebago County 403 F.3d 926, 927, (7th Cir 2005).

That, NLCI and CCI all Retaliated against me and turn a blind eye to the illegal transfer of NLCI... See attached Statement of Claims For a Clear Understanding of the FACTS. All i did was mailed, my mail out The Correct way and wrote (ICE'S) about staff manners

Hardaway v Meyerhoff 734 F.3d 740, 743-44 (7th Cir 2013)

Bridges v Gilbert 557 F.3d 541 (7th Cir 2009)

V. RELIEF YOU REQUEST

State briefly and exactly what you want the court to do for you. Use this space only to request remedies for the injuries you complain about.

#1 I request the Court Appoint Counsel. #2 Seeking the Relief of \$5,000,000 Five Million Dollars in Punitive and Compensatory Damages in Official Capacity jointly and Severally. #3 This ongoing problem has significantly affected my daily life and activities. #4 I have been affected from this illegal transfer by NLGI to CCI I was Drag, Beaten and Sexual Assaulted the day of my release from CCI April 28, 2015. #5 My Mental Health has me Delusional. #6 I've gone "HALF" treated for mental health issues. #7 I will have to pay for future Medical Health care problems as a result of the Defendants Behavior... ETC etc

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 1 day of October, 2015

Bobbie Bowen SR
Signature of Plaintiff(s)

(If there are multiple plaintiffs, each must sign the complaint)

Institutional Identification Number(s) #354316